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Counsel to the Ad Hoc Group of Equity Holders of Voyager Digital Ltd.

kmoynihan@kilpatricktownsend.com

### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

VOYAGER DIGITAL HOLDINGS, LLC, et al., : Case No. 22-10943 (MEW)

Debtors.<sup>1</sup> : (Jointly Administered)

#### **CERTIFICATE OF SERVICE**

I hereby certify that on October 12, 2022, true and correct copies of the following were filed electronically with the Clerk of the Court using the CM/ECF system, which in turn will send notifications of such filings to all interested parties of record:

- 1. Limited Objection of the Ad Hoc Group of Equity Interest Holders to Debtors' Motion for Entry of an Order (i) Authorizing Entry Into the Asset Purchase Agreement and (ii) Granting Related Relief [ECF No. 523] (the "Sale Objection");
- 2. Objection of the Ad Hoc Group of Equity Interest Holders to Debtors' Motion for Entry of an Order Approving (i) the Adequacy of the Disclosure Statement, (ii) Solicitation and Notice Procedures, (iii) Forms of Ballots and Notices in Connection Therewith,

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors' principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

- and (iv) Certain Dates with Respect Thereto [ECF No. 524] (the "Disclosure Statement Objection"); and
- 3. Declaration of Matthew Dundon in Support of the Objection of the Ad Hoc Group of Equity Interest Holders to Debtors' Motions for Entries of Orders Approving the Adequacy of the Disclosure Statement, Solicitation and Notices Procedures, Forms of Ballots and Notices in Connection Therewith, and Certain Dates with Respect Thereto [ECF No. 525] (the "Dundon Declaration").

I further certify that on October 12, 2022, I caused true and correct copies of the (i) Sale Objection, (ii) Disclosure Statement Objection, and (iii) Dundon Declaration to be served upon the parties identified on the Master Email Service List attached hereto as **Exhibit A**, via email.

I further certify that on October 13, 2022, I caused true and correct copies of the (i) Sale Objection, (ii) Disclosure Statement Objection, and (iii) Dundon Declaration to be served upon the parties identified on the Master Service List attached hereto as **Exhibit B**, via First Class Mail.

[Signature Appears on Following Page]

Dated: October 14, 2022 /s/ David M. Posner

#### KILPATRICK TOWNSEND & STOCKTON LLP

David M. Posner, Esq. Kelly E. Moynihan, Esq. The Grace Building 1114 Avenue of the Americas New York, New York 10036-7703 Telephone: (212) 775-8700

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-and-

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Counsel to the Ad Hoc Group of Equity Holders of Voyager Digital Ltd.

### EXHIBIT A

### **Master Email Service List**

Creditor Name	Email Address
ALAMEDA RESEARCH LLC	dietdericha@sullcrom.com; gluecksteinb@sullcrom.com; bellerb@sullcrom.com
DISTRICT OF COLUMBIA	OAG@DC.GOV
ED BOLTON	ADAM.SWICK@AKERMAN.COM; JOHN.THOMPSON@AKERMAN.COM; JOANNE.GELFANG@AKERMAN.COM
EMERALD OCEAN ISLE, LLC, AMANO GLOBAL HOLDINGS, INC., SHINGO LAVINE, AND ADAM LAVINE	MATTM@GOLDMCLAW.COM; HARLEYG@RESTRUCTURINGSHOP.COM; STEVENY@GOLDMCLAW.COM
EMERALD OCEAN ISLE, LLC, AMANO GLOBAL HOLDINGS, INC., SHINGO LAVINE, AND ADAM LAVINE	DTABACHNIK@DTTLAW.COM
FRANCINE DE SOUSA	MICHAEL.ROBB@SISKINDS.COM; GARETT.HUNTER@SISKINDS.COM
FRANCINE DE SOUSA	ANTHONY.OBRIEN@SISKINDS.COM
ILLINOIS SECRETARY OF STATE	JOHN.REDING@ILAG.GOV
JASON RAZNICK	PHAGE@JAFFELAW.COM
JON GIACOBBE	MANNY@ALICANDROLAWOFFICE.COM
KELLEHER PLACE MANAGEMENT, LLC	AHAMMER@HMBLAW.COM; NDELMAN@HMBLAW.COM; EFCNOTICES@HMBLAW.COM
MARCUM LLP	GOTTESMAN@MINTZANDGOLD.COM
MARK CUBAN AND DALLAS BASKETBALL LIMITED	SBEST@BROWNRUDNICK.COM;
D/B/A DALLAS MAVERICKS  MARK CUBAN AND DALLAS BASKETBALL LIMITED,	RWOLKINSON@BROWNRUDNICK.COM SWISSNER-GROSS@BROWNRUDNICK.COM;
D/B/A DALLAS MAVERICKS	KAULET@BROWNRUDNICK.COM
MATTHEW EDWARDS	GEORGELAWOK@GMAIL.COM
METROPOLITAN COMMERCIAL BANK	SINGERG@BALLARDSPAHR.COM
METROPOLITAN COMMERCIAL BANK	RGMASON@WLRK.COM; ARWOLF@WLRK.COM; AKHERRING@WLRK.COM
MICHAEL GENTSCH	CBARSKI@BARSKILAW.COM
MICHAEL LEGG	RRK@MCCARTHYLEBIT.COM; NRO@MCCARTHYLEBIT.COM
MURPHY PLACE MANAGEMENT LLC	ahammer@hmblaw.com; ndelman@hmblaw.com; ecfnotices@hmblaw.com
OFFICE OF THE UNITED STATES TRUSTEE	RICHARD.MORRISSEY@USDOJ.GOV; MARK.BRUH@USDOJ.GOV
OFFICIAL COMMITTEE OF UNSECURED CREDITORS	RUSS.STEWART@TMF.MORTGAGE.COM
OFFICIAL COMMITTEE OF UNSECURED CREDITORS	JASON@BEZINGA.COM
OFFICIAL COMMITTEE OF UNSECURED CREDITORS	BRANDONMULLENBERG2022@GMAIL.COM
OFFICIAL COMMITTEE OF UNSECURED CREDITORS	RICHARD.KISS@GMAIL.COM
OFFICIAL COMMITTEE OF UNSECURED CREDITORS	CHRISMMOSER@GMAIL.COM
OFFICIAL COMMITTEE OF UNSECURED CREDITORS	BYWALKER01@GMAIL.COM
OFFICIAL COMMITTEE OF UNSECURED CREDITORS	FREEMANMELISSAC@GMAIL.COM
OFFICIAL COMMITTEE OF UNSECURED CREDITORS	DAZMAN@MWE.COM; JCALANDRA@MWE.COM; JBEVANS@MWE.COM
OFFICIAL COMMITTEE OF UNSECURED CREDITORS	CRGIBBS@MWE.COM; GWILLIAMS@MWE.COM
OFFICIAL COMMITTEE OF UNSECURED CREDITORS	GSTEINMAN@MWE.COM
ORACLE AMERICA, INC.	SCHRISTIANSON@BUCHALTER.COM
PIERCE ROBERTSON	RPACHULSKI@PSZJLAW.COM; AKORNFELD@PSZJLAW.COM; DGRASSGREEN@PSZJLAW.COM; JROSELL@PSZJLAW.COM
ROBERT SNYDERS & LISA SNYDERS	ANGELINAL@JPFIRM.COM
SECURITIES & EXCHANGE COMMISSION	SECBANKRUPTCY-OGC-ADO@SEC.GOV
SECURITIES & EXCHANGE COMMISSION	BANKRUPTCYNOTICESCHR@SEC.GOV

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Creditor Name	Email Address
SECURITIES & EXCHANGE COMMISSION	NYROBankruptcy@SEC.GOV
STATE OF ALABAMA	CONSUMERINTEREST@ALABAMAAG.GOV
STATE OF ALASKA	ATTORNEY.GENERAL@ALASKA.GOV
STATE OF ARIZONA	AGINFO@AZAG.GOV
STATE OF ARKANSAS	OAG@ARKANSASAG.GOV
STATE OF CALIFORNIA	XAVIER.BECERRA@DOJ.CA.GOV
STATE OF COLORADO	CORA.REQUEST@COAG.GOV
STATE OF CONNECTICUT	ATTORNEY.GENERAL@CT.GOV
STATE OF FLORIDA	ASHLEY.MOODY@MYFLORIDALEGAL.COM
STATE OF HAWAII	HAWAIIAG@HAWAII.GOV
STATE OF IDAHO	STEPHANIE.GUYON@AG.IDAHO.GOV
STATE OF ILLINOIS	michelle@lisamadigan.org
STATE OF IOWA	CONSUMER@AG.IOWA.GOV
STATE OF KANSAS	DEREK.SCHMIDT@AG.KS.GOV
STATE OF LOUISIANA	ADMININFO@AG.STATE.LA.US
STATE OF MAINE	ATTORNEY.GENERAL@MAINE.GOV
STATE OF MARYLAND	OAG@OAG.STATE.MD.US
STATE OF MINNESOTA	ATTORNEY.GENERAL@AG.STATE.MN.US
STATE OF MISSOURI	CONSUMER.HELP@AGO.MO.GOV
STATE OF MONTANA	CONTACTDOJ@MT.GOV
STATE OF NEW HAMPSHIRE	ATTORNEYGENERAL@DOJ.NH.GOV
STATE OF NEW MEXICO	HBALDERAS@NMAG.GOV
STATE OF NORTH DAKOTA	NDAG@ND.GOV
STATE OF OKLAHOMA	QUESTIONS@OAG.OK.GOV
STATE OF OREGON	ELLEN.ROSENBLUM@DOG.STATE.OR.US; ATTORNEYGENERAL@DOJ.STATE.OR.US
STATE OF RHODE ISLAND	AG@RIAG.RI.GOV
STATE OF UTAH	UAG@UTAH.GOV
STATE OF UTAH	UAG@UTAH.GOV
STATE OF VERMONT	AGO.INFO@VERMONT.GOV
STATE OF VIRGINIA	MAIL@OAG.STATE.VA.US
STATE OF WASHINGTON	stephen.manning@atg.wa.gov
STATE OF WEST VIRGINIA	CONSUMER@WVAGO.GOV
STEVE LAIRD	BFORSHEY@FORSHEYPROSTOK.COM
TEXAS DEPARTMENT OF BANKING	JASON.BINFORD@OAG.TEXAS.GOV; LAYLA.MILLIGAN@OAG.TEXAS.GOV; ABIGAIL.RYAN@OAG.TEXAS.GOV; ROMA.DESAI@OAG.TEXAS.GOV
TEXAS STATE SECURITIES BOARD	ABIGAIL.RYAN@OAG.TEXAS.GOV; LAYLA.MILLIGAN@OAG.TEXAS.GOV; JASON.BINFORD@OAG.TEXAS.GOV
TN DEPT OF COMMERCE AND INSURANCE	AGBANKNEWYORK@AG.TN.GOV
TORONTO STOCK EXCHANGE	WEBMASTER@TMX.COM
VERMONT DEPARTMENT OF FINANCIAL REGULATION	JENNIFER.ROOD@VERMONT.GOV

### **EXHIBIT B**

#### **Master First Class Mail Service List**

Creditor Name	Attention	Address 1	Address 2	City	State	Zip	Country
ALAMEDA VENTURES LTD		F20 1ST FLOOR, EDEN PLAZA		EDEN ISLAND			Seychelles
INTERNAL REVENUE SERVICE		PO BOX 7346		PHILADELPHIA	PA	19101-7346	
SPECIAL COUNSEL TO DEBTOR VOYAGER DIGITAL, LLC	C/O QUINN EMANUEL URQUHART & SULLIVAN LLP	ATTN: SUSHEEL KIRPALANI, KATE SCHERLING, & ZACHARY RUSSELL	51 MADISON AVENUE 22ND FLOOR	NEW YORK	NY	10010	
STATE OF GEORGIA	OFFICE OF THE ATTORNEY GENERAL	40 CAPITOL SQ SW		ATLANTA	GA	30334	
STATE OF INDIANA	OFFICE OF THE INDIANA ATTORNEY GENERAL	INDIANA GOVERNMENT CENTER SOUTH	302 W WASHINGTON ST, 5TH FLOOR	INDIANAPOLIS	IN	46204	
STATE OF KENTUCKY	ATTORNEY GENERAL - DANIEL CAMERON	700 CAPITAL AVENUE, SUITE 118		FRANKFORT	KY	40601	
STATE OF MASSACHUSETTS	ATTORNEY GENERAL'S OFFICE	1 ASHBURTON PLACE, 20TH FLOOR		BOSTON	MA	02108	
STATE OF MICHIGAN	DEPARTMENT OF ATTORNEY GENERAL	525 W OTTAWA ST		LANSING	MI	48906	
STATE OF MISSISSIPPI	OFFICE OF THE ATTORNEY GENERAL	WALTER SILLERS BUILDING	550 HIGH ST, PO BOX 220	JACKSON	MS	39201	

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Creditor Name	Attention	Address 1	Address 2	City	State	Zip	Country
STATE OF NEBRASKA	OFFICE OF THE ATTORNEY GENERAL	2115 STATE CAPITOL		LINCOLN	NE	68509	
STATE OF NEVADA	OFFICE OF THE ATTORNEY GENERAL	OLD SUPREME COURT BUILDING	100 N CARSON ST	CARSON CITY	NV	89701	
STATE OF NEW JERSEY	OFFICE OF THE ATTORNEY GENERAL	RICHARD J. HUGHES JUSTICE COMPLEX	25 MARKET ST 8TH FL, WEST WING BOX 080	TRENTON	NJ	8611	
STATE OF NEW YORK	OFFICE OF THE ATTORNEY GENERAL	THE CAPITOL	2ND FLOOR	ALBANY	NY	12224	
STATE OF NORTH CAROLINA	OFFICE OF THE ATTORNEY GENERAL	114 W EDENTON ST		RALEIGH	NC	27603	
STATE OF OHIO	OFFICE OF THE ATTORNEY GENERAL	STATE OFFICE TOWER	30 E BROAD ST 14TH FL	COLUMBUS	ОН	43215	
STATE OF PENNSYLVANIA	OFFICE OF THE ATTORNEY GENERAL	STRAWBERRY SQUARE 16TH FL		HARRISBURG	PA	17120	
STATE OF SOUTH CAROLINA	OFFICE OF THE ATTORNEY GENERAL	REMBERT C. DENNIS BLDG	1000 ASSEMBLY ST RM 519	COLUMBIA	SC	29201	
STATE OF SOUTH CAROLINA	OFFICE OF THE ATTORNEY GENERAL	PO BOX 11549		COLUMBIA	SC	29211	
STATE OF SOUTH DAKOTA	OFFICE OF THE ATTORNEY GENERAL	1302 E HIGHWAY 14, STE 1		PIERRE	SD	57501-8501	
STATE OF TENNESSEE	OFFICE OF THE ATTORNEY GENERAL	PO BOX 20207		NASHVILLE	TN	37202-0207	

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Creditor Name	Attention	Address 1	Address 2	City	State	Zip	Country
STATE OF TEXAS	OFFICE OF THE ATTORNEY GENERAL	300 W. 15TH ST		AUSTIN	TX	78701	
STATE OF WASHINGTON	OFFICE OF THE ATTORNEY GENERAL	1125 WASHINGTON ST SE		OLYMPIA	WA	98501	
STATE OF WASHINGTON	OFFICE OF THE ATTORNEY GENERAL	PO BOX 40100		OLYMPIA	WA	98504-00	
STATE OF WISCONSIN	OFFICE OF THE ATTORNEY GENERAL	17 WEST MAIN STREET, ROOM 114 EAST P		MADISON	WI	53702	
STATE OF WYOMING	OFFICE OF THE ATTORNEY GENERAL	109 STATE CAPITOL		CHEYENNE	WY	82002	
TEXAS SECURITIES BOARD	C/O OFFICE OF THE ATTORNEY GENERAL OF TEXAS	ATTN: ROMA N. DESAI ASSISTANT ATTORNEY GENERAL	PO BOX 12548	AUSTIN	TX	78711-2548	
UNITED STATES ATTORNEY'S OFFICE	SOUTHERN DISTRICT OF NEW YORK	ONE ST. ANDREWS PLAZA		NEW YORK	NY	10007	
UNITED STATES DEPARTMENT OF JUSTICE	ATTORNEY GENERAL OF THE U.S.	950 PENNSYLVANIA AVE, NW		WASHINGTON	DC	20530-0001	
WELLS FARGO BANK, N.A.	C/O ALDRIDGE PITE, LLP	ATTN: GREGORY A. WALLACH	15 PIEDMONT CENTER	ATLANTA	GA	30305	
WEST REALM SHIRES INC.	RAMNIK ARORA, CAN SUN, RAHUL SHARMA	2000 CENTER STREET, 4TH FLOOR		BERKLEY	CA	94704	